

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

DEQUE SYSTEMS INC.,

Plaintiff,

v.

Case No. 1:24-cv-00217-AJT-WEF

**BROWSERSTACK, INC., and
BROWSERSTACK SOFTWARE PVT.
LTD.,**

Defendants.

**PLAINTIFF DEQUE SYSTEMS INC.'S
MOTION FOR EXTENSION OF PRETRIAL DEADLINES**

Pursuant to Federal Rule of Civil Procedure 16(b), Local Civil Rule 16, and this Court's Scheduling Order (Dkt. 37), Plaintiff Deque Systems Inc. ("Plaintiff" or "Deque") respectfully moves the Court for an extension of the deadline for Deque to serve its Rule 26(a)(2) expert disclosure as well as a two-week extension of all remaining pretrial deadlines in this action. The grounds for Deque's Motion are fully detailed in the accompanying Memorandum in Support filed contemporaneously herewith. A proposed Order also is attached hereto.

Dated: September 20, 2024

Respectfully submitted,

DYKEMA GOSSETT PLLC

/s/ Charles W. Chotvac
Charles W. Chotvac (VSB# 70045)
1301 K Street, N.W., Suite 1100 West
Washington, D.C. 20005
Telephone: (202) 906-8600
Facsimile: (202) 906-8669
cchotvac@dykema.com

Steven McMahon Zeller (*pro hac vice*)
10 South Wacker Drive, Suite 2300
Chicago, IL 60606

Telephone: (312) 876-1700
Facsimile: (312) 876-1155
szeller@dykema.com

J. Daniel Harkins (*pro hac vice*)
Ryan D. Borelo (*pro hac vice*)
112 East Pecan Street, Suite 1800
San Antonio, TX 78205
Telephone: (210) 554-5500
Facsimile: (210) 226-8395
dharkins@dykema.com
rborelo@dykema.com

BODMAN PLC

Justin P. Bagdady (*pro hac vice*)
201 S. Division Street, Suite 400
Ann Arbor, MI 48104
Telephone: (734) 930-2727
Facsimile: (743) 930-2494
jbagdaddy@blodmanlaw.com

Stephen P. Dunn (*pro hac vice*)
201 W. Big Beaver Road, Suite 500
Troy, MI 48084
Telephone: (248) 743-6031
Facsimile: (248) 743-6002
sdunn@bodmanlaw.com

Alan J. Gocha (*pro hoc vice*)
99 Monroe Ave, Suite 300
Grand Rapids, MI 49503
Telephone: (616) 205-4330
agocha@bodmanlaw.com

Counsel for Plaintiff Deque Systems Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of September, 2024, the foregoing Motion for Extension of Pretrial Deadlines was electronically filed with the Clerk of the Court using the Court's CM/ECF system, which shall send notification of electronic filing to all counsel of record.

/s/ Charles W. Chotvacs
Charles W. Chotvacs